

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
:
GOVERNMENT OF THE UNITED :
STATES VIRGIN ISLANDS, :

22-cv-10904

Plaintiff, :

NOTICE OF MOTION

-against- :

JP MORGAN CHASE BANK, N.A., :

Defendant. :
----- X

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Jordan Merson and Memorandum of Law, both dated April __, 2024, Proposed Intervenor, by and through their undersigned counsel, shall move this Court at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, at such time, as designated by the court for an Order granting them access to the unredacted filings in this action to the parties and their counsel in accordance with the same Protective Order entered in this action, together with such other and further relief as this Court deems just and proper.

Dated: April 3, 2024
New York, New York

Respectfully submitted,

MERSON LAW PLLC

By: /s/ Jordan Merson

Jordan Merson, Esq.
950 Third Avenue, 18th Floor
New York, NY 10022
Telephone: (212) 603-9100
Fax: (347)- 441-4171
JMerson@MersonLaw.Com
Counsel for Proposed Intervenor

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	x	
	:	
GOVERNMENT OF THE UNITED	:	
STATES VIRGIN ISLANDS,	:	
Plaintiff,	:	22-cv-10904
	:	
-against-	:	
	:	
JP MORGAN CHASE BANK, N.A.,	:	
	:	
Defendant.	:	
	:	
x-----		

**DECLARATION OF JORDAN MERSON IN SUPPORT OF PROPOSED
INTERVENORS' MOTION**

1. I, Jordan Merson, Esq., hereby declare as follows:

2. I am a member of the law firm Merson Law, PLLC and counsel for Proposed Intervenor in this action. Proposed Intervenor is the Plaintiff in the action, *Doe v. USVI, et al.*, 23-cv-10301 (AS), presently pending in this Court.

3. I make this Declaration in support of Proposed Intervenor's motion for an Order granting them access to the unredacted filings in this action to the parties and their counsel in accordance with the same Protective Order entered in this action. If this application is granted, said Protective Order will be circulated to counsel for the parties in the *Doe v. USVI, et al.*, 23-cv-10301 (AS) action.

4. In support thereof, I annex:

Exhibit A - a Proposed Confidentiality Order; and

Exhibit B - this Court's Order in *Doe I v. JP Morgan Chase & Co.*, 22-cv-10019-JSR, Document 5.

Dated: April 3, 2024
New York, New York

Respectfully submitted,

MERSON LAW, PLLC

By: /s/ Jordan Merson
Jordan Merson
950 Third Avenue, 18th floor
New York, NY 10022
Telephone: (212) 603-9100
Fax: (347)- 441-4171
JMerson@MersonLaw.Com
Counsel for Plaintiff